

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF RHODE ISLAND (PROVIDENCE)

IN RE:

Robert Leonard Oliver, Jr.,  
Debtor

Case No. 22-10241-DF  
Chapter 13

**AFFIDAVIT OF NON-COMPLIANCE**

I, Joseph Dolben of Harmon Law Offices, P.C., do hereby state as follows:

1. On, November 8, 2022 this Court entered an Order (the “Order”) providing that Debtor(s) was/were to cure the existing post-petition default. The Order also states that in the event Debtor(s) should fail to make the payments by the dates in accordance with the terms of the Order, or if Debtor(s) should default in making future monthly, post-petition payments, the Movant may file with this Court and mail to all interested parties a Notice describing the alleged default.
2. Debtor has defaulted on the order by not making all required payments and is out of compliance with the Order.
3. The following chart sets forth the post-petition amounts due pursuant to the terms of the Order that have not been paid as of March 2, 2023:

Monthly Post-Petition Payments	From	To	Monthly Payment Amount	Monthly Amount Due:	Total Payments made:	Total Payments Due:
3	12/01/2022	02/01/2023	\$819.85	\$819.85	\$0.00	\$2,459.55
Agreed Order Payments	From	To	Monthly Payment Amount		Total Payments made:	
1	12/15/2022	12/15/2022	\$813.15	\$813.15	\$0.00	\$813.15
2	01/15/2023	02/15/2023	\$813.16	\$813.16	\$0.00	\$1,626.32
Partial Payments (suspense balance)						\$0.00

**Total Amount of Default: \$4,899.02**



4. Pursuant to the terms of the Order, a ten (10) day Notice of Default was sent to the Debtor and Debtor's attorney regarding the amount due on February 6, 2023. To date, the loan remains in default as detailed.
5. The movant requests that the automatic stay be hereby terminated by the filing of this Affidavit and relief from automatic stay be granted by the Court to allow JPMorgan Chase Bank, N.A., successor by merger to Chase Home Finance LLC to foreclose on the mortgage given by Robert Leonard Oliver, Jr. dated February 28, 2007 as described in the attached order for relief.

Respectfully submitted,  
JPMorgan Chase Bank, N.A., successor by merger to  
Chase Home Finance LLC,  
By its Attorney

/s/ Joseph Dolben  
Joseph Dolben  
RI Bar Number 7916  
Harmon Law Offices, P.C.  
PO Box 610389  
Newton Highlands, MA 02461  
(617)558-0500  
[ribk@harmonlaw.com](mailto:ribk@harmonlaw.com)

Dated: March 16, 2023

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CERTIFICATE OF SERVICE

I, Joseph Dolben, state that on March 16, 2023, I electronically filed the foregoing document with the United States Bankruptcy Court for the District of Rhode Island on behalf of JPMorgan Chase Bank, N.A., successor by merger to Chase Home Finance LLC using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

Jack Pitts  
John Boyajian  
Gary L. Donahue

I certify that I have mailed by first class mail, postage prepaid, the documents electronically filed with the Court on the following non CM/ECF participants:

Robert Leonard Oliver, Jr.  
a/k/a Robert Oliver  
56 Naomi St  
Bristol, RI 02809

Respectfully submitted,  
JPMorgan Chase Bank, N.A., successor by merger to  
Chase Home Finance LLC,  
By its Attorney

/s/ Joseph Dolben  
Joseph Dolben  
RI Bar Number 7916  
Harmon Law Offices, P.C.  
PO Box 610389  
Newton Highlands, MA 02461  
(617)558-0500  
ribk@harmonlaw.com

Dated: March 16, 2023